



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 16, 2016

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**Re: United States v. Kaleil Isaza Tuzman et al.,
S7 15 Cr. 536 (PGG)**

Dear Judge Gardephe:

The Government respectfully submits this letter to update the Court on the status of the forensic comparison analysis being conducted by the Securities and Exchange Commission (“SEC”). The SEC’s forensic unit has completed its comparison of the Maiden computers produced to the FBI in or about August 2013 (the “FBI Images”) against the images of the same computers produced by Maiden to the SEC in or about November 2014 (the “SEC Images”). Maiden’s counsel is currently reviewing the documents that were only on the SEC Images and that contain one or more of the search terms from the Forensic Imaging and Analysis Agreement (the “Forensic Agreement”). Maiden’s counsel expects that their review will be complete within approximately two weeks.

Accordingly, the parties propose to update the Court further in two weeks, on December 30, 2016.

Respectfully submitted,

**PREET BHARARA
United States Attorney**

By: /s/
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